

Exhibit 72

Sonal Singh, M.D., M.P.H.

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS MDL NO:
LIABILITY LITIGATION 16-2738 (FLW)(LHG)

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THIS DOCUMENT RELATES TO
ALL CASES

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VIDEOTAPED DEPOSITION UNDER ORAL EXAMINATION OF
SONAL SINGH, M.D., M.P.H.
January 16, 2019, 9:07 a.m.

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REPORTED BY: JANET M. SAMBATARO, RMR, CRR, CLR

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1 at meta-analysis that, you know, cause, as well
2 as the IARC report that, you know, talks about
3 asbestos and fibrous talc as a carcinogen and
4 also cites studies that show that asbestos causes
5 ovarian cancer. But, again, I wasn't doing a
6 formal causal analysis.

7 Q. Do you agree that research on the
8 potential relationship between asbestos and
9 ovarian cancer has only considered a small number
10 of cases?

11 MS. PARFITT: Objection. Form.

12 A. I mean, ovarian cancer is a rare, rare
13 disease. And, you know, it's going to be a small
14 number of cases, regardless of etiology, what
15 they are trying to study.

16 Q. How many of the studies involve
17 occupational exposure?

18 A. I think the predominant --

19 MS. PARFITT: Objection.

20 A. -- studies have involved occupational
21 exposure.

22 Q. How many were nonoccupational, if any?

23 A. I don't recall the numbers.

24 Q. Did any of the nonoccupational asbestos
25 studies reach statistical significance?

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1 A. Again --

2 Q. You don't disagree with that, do you?

3 A. Yeah. I mean, I don't -- but I don't
4 disagree -- I mean, I'm relying on the IARC
5 assessment and others that, you know, there's a
6 causal association between exposure. Again, I
7 did not review. I would have gotten and reviewed
8 evidence, Edelman and White and others, if I had
9 to do it over again.

10 MR. ZELLERS: Let's take a break.
11 We'll come back and I'll finish up. Thank you.

12 THE VIDEOGRAPHER: Off the record,
13 3:32 p.m.

14 (A recess was taken.)

15 THE VIDEOGRAPHER: Here begins Media
16 No. 5 in today's deposition of Sonal Singh, MD,
17 M.P.H. Back on the record, 3:43 p.m.

18 BY MR. ZELLERS:

19 Q. Dr. Singh, do you agree that exposure
20 to asbestos through perineal cosmetic talc use,
21 assuming the talc contains asbestos fibers, is
22 different than the heavy occupational exposure
23 that's primarily been researched?

24 MS. PARFITT: Objection to form.

25 A. Again, you know, I've not professed to

1 be an expert in different kinds and routes of
2 asbestos exposure. My -- my sort of -- at least
3 my understanding of my causal question was
4 exposure to talcum powder products and ovarian
5 cancer and whether the constituents can provide
6 evidence in support or refute that association.

7 So, you know, whether asbestos exposure,
8 what different kinds, others will opine on that.

9 Q. Do you know what a cleavage fragment
10 is?

11 A. No. And we can go on on this kind of
12 stuff, and I'll say no.

13 Q. Do you know how it differs from an
14 asbestos fiber?

15 A. No. And I'm not a mineralogist.

16 Q. If I ask you a whole line of questions
17 about different types of asbestos, you're going
18 to defer to other folks?

19 A. Yes.

20 Q. Is there any epidemiology
21 substantiating the theory that fragrance
22 ingredients can cause ovarian cancer?

23 A. I'm not aware of such studies.

24 Q. Is there any epidemiology
25 substantiating the theory that exposure to trace

1 amounts of the heavy metals at issue can cause
2 ovarian cancer?

3 A. I'm not aware of -- you know, again, I
4 didn't do the evaluation, trace the specific
5 constituents of ovarian cancer. I just was
6 trying to understand the constituents, what are
7 they. I just, you know, whether trace -- trace
8 elements cause inflammation and -- you know, but
9 I am not aware of studies that link them directly
10 to ovarian cancer.

11 Q. You're not opining in this case that
12 the fragrance chemicals and heavy metals that may
13 be present in baby powder are causally associated
14 with ovarian cancer.

15 MS. PARFITT: Objection.

16 Q. Correct?

17 MS. PARFITT: Form.

18 A. Yes. I'm not -- again, I'm not opining
19 on the individual constituents of talcum powder
20 products. My opinion is, you know, I look at the
21 exposure and the exposure is talcum powder
22 products, and the presence of constituents, some
23 of which are identified as, you know, Grade 1
24 carcinogens, others as Grade 2, provide evidence
25 in support, and others may -- you know, others

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1 ACKNOWLEDGMENT OF DEPONENT

2

 I, _____, do
3 hereby certify that I have read the
 foregoing pages, and that the same
4 is a correct transcription of the answers
 given by me to the questions therein
5 propounded, except for the corrections or
 changes in form or substance, if any,
6 noted in the attached Errata Sheet.

7

8 _____
 SONAL SINGH, M.D., M.P.H. DATE

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 Subscribed and sworn
15 to before me this
 _____ day of _____, 20____.

16

 My commission expires: _____

17

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Notary Public

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Sonal Singh, M.D., M.P.H.

1 C E R T I F I C A T E

2 COMMONWEALTH OF MASSACHUSETTS

3 SUFFOLK, SS.

4 I, Janet M. Sambataro, a Registered Merit
5 Reporter and a Notary Public within and for the
6 Commonwealth of Massachusetts do hereby certify:

7 THAT SONAL SINGH, M.D., M.P.H., the witness
8 whose testimony is hereinbefore set forth, was duly
9 sworn by me and that such testimony is a true and
10 accurate record of my stenotype notes taken in the
11 foregoing matter, to the best of my knowledge, skill
12 and ability; that before completion of the deposition
13 review of the transcript was requested.

14 I further certify that I am not related to any
15 parties to this action by blood or marriage; and that
16 I am in no way interested in the outcome of this
17 matter.

18 IN WITNESS WHEREOF, I have hereunto set my hand
19 this 17th day of January, 2019.

20

21

JANET M. SAMBATARO

22

Notary Public

My Commission Expires:

23 July 16, 2021

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